

Submission to the first stage of Public Consultation for the National Planning Framework – Ireland 2040 Our Plan

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This submission is made in a personal capacity

About me: I am a Post-Doctoral Research Fellow in the School of Architecture, Planning and Environmental Policy at UCD. I hold a BA (Mod.) in Economic and Social Studies from the University of Dublin, Trinity College (2007) and am a qualified Planner having graduated with First Class Honours from the UCD Master of Regional and Urban Planning Programme in 2009. In March 2015, I successfully defended my PhD in Planning from UCD in which I investigated issues of sustainable development and quality of life in the contemporary urban environment. This research was funded for four years through the UCD PhD Programme in Sustainable Development, a Graduate Research Education Programme funded by the Irish Research Council (IRC).

Current research: I am currently employed as a Post-Doctoral Researcher on the Eco-Health project in the UCD School of Architecture, Planning and Environmental Policy (www.ecohealth.ie). The project is funded jointly by the EPA and HSE and is exploring the health benefits of green spaces as a means to supply evidence and tools for developing health promoting environments or 'healthy places'. I worked previously (2014-2016) as a Research Assistant and Post-Doctoral Researcher on the IRC funded OASIS Project. This research was concerned with the optimisation of strategic noise mapping and population exposure estimation for meeting the requirements of the European Noise Directive. I have also been employed by An Bord Pleanála (Planning Inspectorate, Summer 2008) and Dublin City Council (Planning and Economic Development Section, Summer 2004-2007).

Content of Submission: The submission that follows includes the key policy recommendations from my PhD research which was titled "*Quality of Life and Sustainable Development in the Contemporary Urban Environment: Exploring Neighbourhood Satisfaction in the Greater Dublin*". These recommendations are based on the results of the analysis which employed rigorous research methodologies. As such the content of the submission is *evidence-based*. Further detail regarding research methodologies is available on request.

Submission: The research which informs this submission was conceived on foot of a realisation that ideas of 'well-being' and 'quality of life' are neither well-defined nor well understood in planning research and policy. When employed as part of, (or in conjunction with) the rhetoric of sustainable development and its variants, these concepts are often used as throw away terms, assumed to follow from various planning and/or policy interventions, be they physical, social or economic. The need to better understand the relationship between well-being and/or quality of life, sustainable development and contemporary urban processes was therefore identified. Having undertaken this

investigation, what follows is a non-exhaustive list of key recommendations for policy developed from the evidence generated from this research project.

Policy recommendations

1. A plan-led system of spatial planning should be instituted in line with the shift towards integrative spatial planning as opposed to laissez-faire developer led approaches. This would be characterised by the roll-out of integrative policy mechanisms in conjunction with a much higher level of prescription compared to the status quo. Where policy is prescriptive, this prescription must be based on evidence-based research which has been tested and verified using methodologies similar to those employed in this empirical project. The NPF consultation document and approach is very welcome in this regard.
2. Policy must not confound 'sustainable development' and its variants with improved 'quality of life'. This research has identified a complex relationship between well-being in place and various notions of sustainability, thereby identifying a need for a more critical approach in the development of place-making strategies. This recommendation is rooted in the argument that policy must define concepts rather than employing terms that "mean everything and nothing" that can be co-opted by those in positions of influence to serve their own ends.
3. To date, urban policy formulation has been dominated by production (planning and developer interests), rather than considering the perspectives of urban residents as regards wide-ranging physical, social and economic aspects of their urban environment and the influence that these have on overall quality of life. It is suggested that such consideration should be central to policymaking. The present research represents a major step forward in generating an understanding of the attitudes and desires of urban inhabitants. This improved understanding can inform the design of policies which aim to jointly achieve sustainable development and quality of life in the urban residential environment. The methodology applied in the present study can be adopted by local authorities and urban policy makers in order to identify those factors which may predict improved quality of life in different contexts, both urban and rural, as well as internationally.
4. An understanding of the factors which influence residential satisfaction, or indeed dissatisfaction, can provide information which can inform the development of residential areas in which people want to live "now and in the future". As such, an understanding of factors that contribute to residential satisfaction can play a critical part in making successful urban and housing policies. A series of specific recommendations follow relating to the specific themes interrogated by this research.

Policy recommendations specific to urban settlements and suburbs in Ireland

5. When analysed in conjunction with other built environment and infrastructure variables, perceptions of an aesthetically pleasing, well maintained and safe public realm were found to predict high levels of neighbourhood satisfaction in **all** urban environments (inner city, suburban and peri-urban). As such, basic provision, upkeep and safety interventions of and for public and green spaces should be prioritised in urban policy initiatives.

6. Where resources for the provision of social services and infrastructure might be limited, investment in services and facilities for vulnerable groups (children and the elderly) can potentially result in the greatest return on investment if the goal is to create satisfaction with neighbourhood and improve quality of life. In locations with large numbers of young families (e.g. fringe suburbs), it is clear that facilities for younger age cohorts are of most immediate concern. This would indicate that investment in safe play spaces, childcare infrastructure and schools would be an appropriate course of action. In more mature areas (e.g. mature suburbs) there is a greater age mix meaning that resources should be distributed more evenly for social infrastructure across age groups. If the strategy is to increase the Inner City population with more balanced demographics, it is clear that investment in quality open and green spaces, childcare, schools and various other related resources can potentially improve the area from a quality of life perspective, thereby creating pull factors for those who would otherwise move to the suburbs to access appropriate services and facilities.
7. To date, policy has focused on the increased provision of dwellings in the context of a dysfunctional housing market, without paying due attention to the ancillary requirements for city centre living. In this regard, the provision of services and facilities which support family living should be prioritised from a quality of life perspective. Such approaches will necessarily require improved integration between agencies which deliver services, both public and private.
8. The study found that the inner city was generally not perceived to be equipped to cater for residents across their entire life cycle. In particular, dwelling characteristics emerged as very important considerations for most respondents expressing a desire to move residence. At the same time, the research found that residential attachment can generally be engendered in any residential environment, but there are very specific requirements that residents require if they are to consider staying in an area in the long term. These include an environment perceived to be conducive to raising children and larger, better quality dwellings. The results would indicate that amongst respondents, the suburban environment is currently seen to satisfy such requirements. Based on these findings, it could be argued that changes in the approach to urban design to cater for children in higher density Inner City environments may work to attract people of child rearing age back to the city centre. A clear requirement would be the provision of larger dwellings which can accommodate growing families in conjunction with quality open spaces, play spaces and adequate school provision.
9. The evidence from this research would indicate that any policy initiative which would support or encourage the development of a large quantum of small apartment dwellings as opposed to those which can accommodate growing families would be detrimental from a quality of life perspective, and ultimately for the sustainable development of the Inner City. Indeed current construction industry demands to reduce minimum apartment sizes in Dublin are indicative of the pressures that the development sector place on planning. Such pressures are suggestive of the powerful hold that the development sector currently holds over urban development.
10. The suburbs should not be regarded by planners and policymakers as the source and worst reflection of the sustainability crisis. Instead, their capacity to deliver quality of life and

environmental sustainability should be recognised and capitalised upon. This will clearly require changes in consumer behaviour. Binding policies for the provision and improvement of green infrastructure and public transport infrastructure may aid the transition to more sustainable lifestyles. In a similar way, improved public-transport provision, information for more sustainable food and energy consumption, support for urban growing initiatives and the better use of vacant and underused plots are ways in which local authorities and other stakeholders can facilitate the necessary behaviour change.

11. In addition to behaviour change as recommended for the mature suburb, there is a clear need for better enforcement of existing policy in order to ensure the adequate provision of services, facilities and other assets at the urban rural fringe. Proper enforcement of the requirements of a criteria test similar to the Residential Development Evaluation testing criteria contained in the National Spatial Strategy would certainly help in this regard. Central to 'quality of life' aspects of these criteria would be the provision of those facilities, amenities and services found to be associated with higher levels of quality of life: a safe and well-kept public realm, services and facilities for vulnerable groups and a range of dwelling types which can fulfil the needs of residents throughout their life courses.

I sincerely hope that these *evidence-based* policy recommendations will inform the *Ireland 2040 Our Plan* framework document. Further information relating to the research design, analysis and results is available on request.

Thank you for your consideration of my submission and I look forward to reading the Draft NPF in due course.

Yours sincerely,

Owen Douglas